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October 4, 2023

VIA CM/ECF ONLYHon. Mark W. Pedersen
100 State Street
Rochester, NY 14614
pedersen@nywd.uscourts.gov**RE: Jason Wemes v. The Canandaigua National Bank & Trust Company;
Case No.: 6:22-cv-06297 (DGL) (MWP)****SUBJECT: Consent Request for Adjournment of Discovery Deadlines**

Dear Magistrate Judge Pedersen:

I write on behalf of Plaintiff Jason Wemes, with the consent of counsel for Defendant, to request an enlargement of time to complete discovery. The parties have propounded and responded to written discovery. The Court has accepted personnel files of two of Defendant's employees for *in camera* review, and will determine what documents, if any, are relevant in accordance with its August 7, 2023 Order (Dkt. 18).

One prior extension of time has been granted. The parties seek to extend the various deadlines in the Amended Scheduling Order set forth on June 1, 2023 by four (4) months as follows:

Deadline	Current date	Proposed date
Factual discovery	October 5, 2023	February 2, 2024
Motions to compel discovery	November 3, 2023	March 1, 2024
Motions to join other parties and to amend the pleadings	November 10, 2023	March 8, 2024
Plaintiff's identification of expert witnesses and provision of reports	December 8, 2024	April 5, 2024
Defendant's identification of expert witnesses and provision of reports	January 5, 2024	May 3, 2024
Plaintiff's identification of rebuttal experts and provision of reports	February 9, 2024	June 7, 2024
All discovery relating to experts, including depositions	March 8, 2024	July 3, 2024
Dispositive motions	May 17, 2024	September 6, 2024

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Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Silverman", with a long horizontal flourish extending to the right.

Gregory L. Silverman